



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

March 31, 2014

Mr. Geoffrey Hunt
Department of State
A/OPR/RPM
HST Room 1264
Washington, DC 20520-1264

Re: Draft Environmental Impact Statement for the Foreign Missions Center at the Former Walter Reed Army Medical Center, Washington, DC (CEQ #20140028)

Dear Mr. Hunt:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Foreign Missions Center (FMC) at the Former Walter Reed Army Medical Center (WRAMC) in Washington, DC.

The purpose of the Proposed Action is to prepare a master plan for the long-term development of a FMC, under authorities of the Foreign Mission Act of 1982, on 43.5 acres of the former WRAMC. The master plan is intended to guide the development of a cohesive campus by establishing design and land-use planning principles for the construction of new buildings, roadways, open green space, and utilities, while minimizing environmental impacts. The need for the Proposed Action is based on increased and high demand for foreign mission facilities in the District of Columbia, a lack of large sites for foreign mission development or redevelopment in the District, and the need for land to use in property exchanges with other countries. The proposed action would be built over approximately 20 years.

During the alternatives development process, six action alternatives were considered and five were dismissed because they did not meet the needs and requirements. DOS identified a Preferred Action Alternative, Alternative 1, which best fulfills its statutory mission and responsibilities. The Preferred Alternative and the No Action Alternative were considered for more detailed analysis in the DEIS.

EPA understands the purpose and need for the proposed action for the FMC. However, as a result of our review of the DEIS, EPA has concerns with vegetation, hazardous substances, traffic, stormwater management, environmental justice/children's health, and cumulative



impacts. In addition, there needs to be clarity of federal ownership/leasing of land responsibilities to ensure implementation/management of proposed FMC site adheres to mandated regulations.

A detailed description of these concerns is presented in the Technical Comments (enclosed) for your consideration. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's rating system is enclosed for your information.

Thank you for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (2)



Environmental Impact Statement (EIS) Rating System Criteria

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

LO (Lack of Objections) - The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

EC (Environmental Concerns) - The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

EO (Environmental Objections) - The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

EU (Environmentally Unsatisfactory) - The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

1 (Adequate) - The draft EIS adequately sets forth the environmental impacts(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

2 (Insufficient Information) - The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3 (Inadequate) - The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.

Technical Comments

Land Use

Page 85 states, "Land use on the former WRAMC consists of buildings, parking areas, small wooded areas and mowed areas." Please quantify and describe the small wooded areas as well as parking areas, mowed areas and building areas in the study area. A breakdown of these areas by size should be provided to better assess pervious versus impervious surface and environmental resources.

Page 88 briefly discusses the WRAMC DC-LRA plan. It is assumed that the 66.5 acre portion of the former WRAMC to be transferred to the DC-LRA will be assessed in a Draft Environmental Impact Statement. When is the DEIS on the DC-LRA portion of the former WRAMC anticipated? Is there coordination among DOS and DC-LRA, where appropriate? What is the construction timeframe and how will both FMC and DC-LRA projects affect the neighboring areas, traffic flow, etc.?

Vegetation

Page x states, "A detailed tree inventory of the area potentially affected by the Preferred Action Alternative was performed; approximately 700 trees were identified..." Page 45 states that in accordance with the Urban Forest Preservation Act of 2002, trees with a circumference of 55 inches or more are classified as special trees. "Special trees cannot be cut down, topped or destroyed without a permit issued by the Mayor's office and mitigated using one of two options: 1) Replacement trees... and 2) Monetary payment..." In addition, "As a federal agency, DOS is not required to comply with this District of Columbia regulation; however, DOS will emphasize retaining the tree canopy in the development of the site." Please state to whom DOS would emphasize retaining tree canopy to. It is assumed that the reference here is the chanceries. If the responsibility is given to the chanceries who are not a federal agency, then shouldn't they be required to comply with the Urban Forest Preservation Action of 2002? Please explain. The EIS should quantify and identify the special trees on the site and specify the approximate number of trees to be preserved and removed.

Cultural Resources

Page 105 states, "The Section 106 Process for the WRAMC consists of two parts: the Section 106 Process and resultant Programmatic Agreement (PA) for the Army Base Realignment and Closure Commission (BRAC) undertaking, and the Section 106 Process and projected PA for the DOS FMC Master Plan undertaking." How was the former WRAMC divided among DOS and the DC-LRA? This process should be explained so as not to question if the site could have been divided differently to better utilize and preserve historic resources and maintain integrity of the WRAMC historic district eligibility.



Page 105 states, “The outcome of the Army Section 106 process was a PA executed between the Army, the DC-HPO and the ACHP. The PA, signed in January 2013, includes a series of stipulations that take into account the effects of the Army undertaking on the identified historic properties.” The DEIS did provide stipulations that related to aboveground historic properties. It is important to note, that once land will be transferred from the Army to DOS a new PA based on the proposed undertaking by DOS would be developed and could incorporate certain stipulations from the Army PA that are appropriated for the new undertaking. It would be helpful to have the June 2013 PA included in an Appendix to review in its entirety.

Page 121 states, “The Phase IA investigation will determine the extent of area with archaeological potential within the property.” Page 122 states, “Should archaeological investigations not be concluded prior to the execution of the PA for the project, stipulations would be included in that document for the treatment of archaeological resources within the APE.” Discuss how the findings of the archaeological investigations could impact the FMC plan?

The PA for the FMC plan and the archaeological investigations are not yet complete. Can further discussions and investigations alter the FMC plan? In addition, the BRAC undertaking and the FMC undertaking are considered separate; thus, the cumulative impact to the historic resources and historic district eligibility could be even greater than anticipated. The cumulative impacts of both undertakings (FMC and DC-LRA) should be presented in the FEIS.

Petroleum Tanks and Hazardous Substances

Page 125 states, “Several contaminated areas (PCB impacted soils, transformer vaults, and transformer pads) remain on the Property (exhibit 3.48). These areas have been remediated to meet “low occupancy area” cleanup levels (U.S. Army Garrison WRAMC, 2006, 2010, 2013).” Describe what is meant by “low occupancy area” and if the referenced areas are safe for the designated reuse.

Page 124, Section 3.13.1, Petroleum Storage Tanks and Electrical Generators, Exhibit 3.47, Summary of Former Storage Tanks: Please explain if the tanks were removed, emptied and/or closed out in place (cleaned out and filled with sand). Please present soil sample location and data to characterize whether or not a spill/leak/release had occurred. Were any soil removals conducted? Any confirmation samples taken? Was groundwater encountered in the grave/footprint of the UST/AST? If groundwater was encountered, were the soil samples clean or below cleanup criteria? If not, then a monitoring well network needs to be installed. Was there any staining on/under the concrete pads in which the electric generators were mounted?

Pages 125 and 126, Section 3.13.2 Polychlorinated Biphenyls (PCBs) and Exhibit 3.48, Petroleum Tanks and Hazardous Substances: Were the results of the soil samples compared to the future reuse of the Former WRAMC (i.e., residential vs. commercial)? Were the closeout



reports approved by EPA and local regulatory agency? What levels of PCBs were found and were they at TSCA levels? Was groundwater encountered during any excavation or free product containing PCBs? There may be a need to monitor groundwater in the vicinity of each release especially if there were solvents present. Were the transformer vaults where known releases have taken place decontaminated or PCBs extracted from the walls and floors of the vaults? Were the vaults demolished and removed? There are several technologies that can be used to extract PCBs from concrete to be able to get clean closure on concrete vaults. It is recommended that cleanup be to residential levels so there are no use limitations.

Page 127: In the area of the Rumbaugh Garage, "Remediation of the PCB contamination was performed in accordance with the regulations to meet "low occupancy area" cleanup levels (U.S. Army Garrison WRAMC, 2006, 2010, 2013); however, additional impacted soil was present in the bottom of the excavation." Were these soils left in place or eventually removed? Describe what is meant by "low occupancy area" and if the referenced areas are safe for the designated reuse. Cleanup to residential levels is recommended so there are no use limitations.

Page 127 states, "The two concrete transformer pads on the east side of Building 40, (north and south) and soils surrounding the pads tested above the PCB action levels for a "low occupancy area" (U.S. Army Garrison WRAMC, 2013). The Army stated that the transformer pads have been remediated in accordance to regulations, and the Army plans to remediate the soils adjacent to the transformer pads in the future (Craig, 2013)." Was this done or when will this be done? Cleaning up to residential levels is recommended so there are no use limitations.

Page 127 states that eight underground transformer vaults contained PCB oil-cooled electrical transformers that leaked into the vault. "The concrete in some of these vaults is impacted by PCBs." When will these vaults be cleaned or removed? Cleaning up to residential levels is recommended so there are no use limitations.

Page 127 states that PCB contamination has been identified inside Buildings 54 and 40. What levels are remaining? Building 54 is to be removed and Building 40 is planned for reuse. Cleanup should match the future reuse plan. Cleaning up to residential levels is recommended so there are no use limitations.

Asbestos: Page 128 states, "The Army is performing additional inspections that will provide more information concerning the location of ACM in buildings." In addition, "The main tunnels have been abated by encapsulation, but the smaller laterals have not been abated (U.S. Army, 2006)." The number of laterals and whether abatement will result should be discussed in the EIS.

Lead-Based Paint: Page 128 states, "Buildings to be re-used may require testing and remediation in accordance with the regulations, depending on the future use of the building."



Please state who would be responsible for testing and remediation of buildings. A complete investigation and assessment of buildings should be provided in the EIS.

Traffic and Transportation

Page 97 states, "Operation of the FMC under the Preferred Action Alternative would generate an estimated 3,410 permanent jobs. It is expected that the overwhelming majority of these jobs (2,524) would be filled by foreign nationals either relocated from current chancery facilities in Washington, D.C. or not previously residing in the country." What was the full occupancy capacity of WRAMC compared to the anticipated occupancy of the FMC (and DC-LRA) to better assess impacts on surrounding areas, traffic flow, etc.?

Page x and Page 50 states, "On-street parking is provided throughout the study area along all streets. Most parking spaces require residential parking permits, though some spaces are metered or unregulated. Other on-street parking is generally prohibited during peak periods (typically 7:00 to 9:30 am and 4:00 to 6:30 pm) but unregulated during off-peak periods." What is the ratio of permit parking vs. meter and unregulated parking? Will the Preferred Alternative affect on-street parking to the streets bordering the FMC/within the study area?

"The Preferred Action Alternative would require that the majority of parking be provided in below-grade lots. Existing buildings that are reused would be required to develop independent below-grade parking solutions and new buildings would need to incorporate parking within their lot in below-grade structures." Please explain the feasibility of incorporating below-grade parking structures for existing buildings. If not feasible, how will the need for parking effect on-street parking, neighboring communities, etc.? Has each lot accounted for below-grade parking? Has the impervious area that may be created for below-grade parking structures been accounted for in the EIS? Is groundwater expected to be encountered? Will it be sampled?

Page 51 states, "The DC-LRA development would generate approximately 1,916 and 2,197 trips during the morning and afternoon peak hours, respectively (exhibit 3.4)." Has the DC-LRA reuse plan been approved? If the reuse plan has not been approved, it is assumed then that the numbers provided may change. Please discuss.

Exhibit 3.4 – Other Developments Trip Generation Rate and Projection, shows trip generation for four future developments and the DC-LRA. It is assumed that the projected rates provided are for a given year. What is the projected rate for the 20 year build-out? The trips generated for Walmart appear to be low (total 133 am peak hour/272 pm peak hour). Please explain how these totals were derived.

Page 65 states, that DOS would provide a Transportation Management Plan for the development. Has DOS coordinated with DDOT on the proposed action?



Page 66 states, "A safety analysis was performed using DDOT accident data from 2008 to 2010 to determine if there was a high accident rate at intersections in the study area." Since the WRAMC closed in 2011, EPA questions whether these years used for analysis may have already had a diminished workforce which could affect the accident rate. It would seem prudent to select the years when the WRAMC was in full operation. Please discuss if 2008-2010 were full operation years for WRAMC and identify the level of occupancy.

Page 67 states, "The No Action and Preferred Action Alternatives would not change commuting patterns or operations or geometry of these intersections which would result in no changes to the crash rates in the study area." It is not clear how this conclusion was derived. It seems likely that there could be an increase in accidents due to additional traffic within the study area as a result of the proposed action, DC-LRA reuse plan and future actions. Please explain and discuss cumulative impact of increased traffic, commuting, etc. in study area.

Stormwater Management/Water Resources

Page 43 states, "The tunnel, which enters the site of the former WRAMC at Georgia Avenue and Dahlia Street, runs southwest under the Rose Garden and discharges into Rock Creek Park." It is assumed that this stormwater drainage system will not be altered as a result of the Proposed Action. Describe and show the Rose Garden on a map. What is the size of the Rose Garden? Is there an historical landscape component to the Rose Garden? Is it on the FMC portion or the DC-LRA portion of the former WRAMC site? Will the Rose Garden be impacted by the Proposed Action?

Page 44 states, "Each individual parcel would be required to address stormwater requirements either via an independent facility or a centralized facility." A holistic approach would provide the best outcome for stormwater management at the FMC site which would then govern individual best management practices to be incorporated into the design plan of each chancery. It may be more accurate to state "Each individual parcel should be required to address stormwater requirements as an independent facility and as a centralized facility."

Page 139 states, "The Preferred Action Alternative would increase impervious surfaces to approximately 35 acres." Please indicate how much of the existing site is pervious versus impervious surface and the changes that will occur to the site as a result of the Preferred Alternative.

Page 139 states, "The DC-LRA project proposed to capture, treat, and reuse stormwater and achieve full water reuse by 2050 through the use of a bio-retention pond, rain gardens, and curbside bio-retention areas. This would reduce stormwater runoff to pre-developed conditions and therefore relieve the projects of any downstream impacts." In addition, "The Preferred Alternative would be required to reduce the developed peak flows from the site of the former WRAMC to predevelopment conditions through detention, reuse and, low impact development."



Has the entire former WRAMC site been evaluated to consider both the FMC and DC-LRA projects with the intent to capitalize and plan for maximizing stormwater management BMPs?

Chesapeake Bay Watershed

Exhibit 1.10 – Applicable Statutes and Executive Orders, does not list EO 13508, Chesapeake Bay Protection and Restoration. The proposed FMC is within the Chesapeake Bay Watershed; therefore, DOS is required to address adherence to EO 13508 as it relates to the proposed action. The Executive Order expresses the great challenge facing our renewed efforts to restore the health of the Chesapeake Bay. To meet the challenge, the Executive Order lays out a series of steps. One of the first key steps requires the federal agencies to define the “next generation of tools and actions to restore water quality in the Chesapeake Bay and describe the changes to be made to regulations, programs, and policies to implement these actions.” As required by Section 502 of the Executive Order, this document (1) provides guidance for federal land management in the Chesapeake Bay and (2) describes proven, cost-effective tools and practices that reduce water pollution, including practices that are available for use by federal agencies. Federal agencies in the Chesapeake Bay watershed will find this guidance useful in managing their lands, ranging from the development and redevelopment of federal facilities to managing agricultural, forested, riparian, and other land areas the federal government owns or manages. Please address adherence to Section 502 Guidance which can be accessed at <http://executiveorder.chesapeakebay.net>.

Environmental Justice

The Environmental Justice Assessment used to identify areas of Environmental Justice (EJ) concern has been incorrectly conducted for minority populations. The DEIS cites the following text on page 101.

“The Council on Environmental Quality (CEQ) guidance for determining EJ populations calls for defining specific thresholds, which are used to identify “meaningfully greater” concentrations of minority and low-income residents than can be found in a larger reference population (CEQ, 1997). For this study, the larger reference populations were defined as the study area overall, as well as the District of Columbia. An EJ population was considered to be present in a census tract or block group when the percent of minority residents exceeded 61 percent, or the percent of low-income residents exceeded 12 percent. These thresholds correspond to the percent of minority and low-income residents found in the larger reference populations (exhibit 3.40).”

“Minority and low-income characteristics of each study area were analyzed to identify geographic locations that are considered as EJ populations. Through application of the 61 percent minority population threshold, 17 of the 18 block groups were identified as EJ populations (exhibit 3.41).”



The text above seems to misunderstand the CEQ Guidance on Environmental Justice when it comes to identifying minority populations. The CEQ document states the following: "Minority populations should be identified where either: the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis." Which means that when the minority population exceeds 50% it is by definition a minority population. If the minority population does not exceed 50% then it is appropriate to use the second test. Since the minority population is greater than 50%, that standard should be used. The 61% benchmark is incorrect and should be removed from the document. Since that benchmark value is correct, the portion of the assessment dealing with the identification of areas of potential EJ concern should be redone. The section of the CEQ document relating to this matter appears below from "Environmental Justice Guidance Under the National Environmental Policy Act" by CEQ pages 25 and 26.

TEXT OF EXECUTIVE ORDER 12898, "FEDERAL ACTIONS TO ADDRESS
ENVIRONMENTAL JUSTICE IN MINORITY POPULATIONS AND LOW-INCOME
POPULATIONS, '

ANNOTATED WITH PROPOSED GUIDANCE ON TERMS IN THE EXECUTIVE ORDER

Section 1- 1. IMPLEMENTATION.

1-101. Agency Responsibilities. To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Marianas Islands.

Low-income population: Low-income populations in an affected area should be identified with the annual statistical poverty thresholds from the Bureau of the Census' Current Population Reports, Series P-60 on Income and Poverty. In identifying low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect.

Minority: Individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.



Minority population: Minority populations should be identified where either:
 (a) the minority population of the affected area exceeds 50 percent or
 (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native American), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.

All of the census tracts identified in this assessment appear to be areas of potential Environmental Justice concern based upon the fact that all have minority populations that exceed 50% minority.

There is a need for comprehensive assessment of the impacts that may occur in areas populated by citizens. Consideration should be given to any and all cumulative impacts that may occur in the study area, and attempts should be made to assure the proper mitigation of any and all impacts as appropriate.

The EIS should provide a map depicting the area census tracts and census blocks.

Protection of Children from Environmental Health Risks

Exhibit 1.10 – Applicable Statutes and Executive Orders, does not list EO 13045, Protection of Children from Environmental Health Risks. The FEIS should address children living in and around the study area and potential impacts (if any) that may result from the Proposed Action. Specify the approximate number of children in the surrounding area. Include a map that shows the Proposed Action in proximity to the surrounding residential areas.

Exhibit 1.9 – Issues Identification and Tracking, asks the question of whether the FMC would include residential space, but no answer was provided. Please respond. Another question was asked (but no answer given) which questions how many people are anticipated to occupy each chancery. The DEIS estimated generation of permanent jobs, but should address the question asked. This information is important to assess trip generation, traffic, occupancy, etc. all of which can impact children's health if inhabiting the area. Please respond and discuss.



The scope of Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks* states in Section 1 of the EO, “A growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health risks and safety risks. These risks arise because: children’s neurological, immunological, digestive, and other bodily systems are still developing; children eat more food, drink more fluids, and breathe more air in proportion to their body weight than adults, children’s size and weight may diminish their protection from standard safety features; and children’s behavior patterns may make them more susceptible to accidents because they are less able to protect themselves.” Therefore, to the extent permitted by law and appropriate, and consistent with the agency’s mission, each Federal agency:

- (a) Shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and
- (b) Shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.

The FEIS should also discuss the study area and any potential affects that the site (including construction and operational activities) may have on children.

EO 13514 Federal Leadership in Environmental, Energy, and Economic Performance

Exhibit 1.10 – Applicable Statutes and Executive Orders, does not list Executive Order (EO) 13514.

Page 129 mentions EO 13514. It later states, “Foreign missions are not subject to these regulations, executive orders, or guidelines; however, the design guidelines for the development of the FMC would encourage foreign missions to design to these sustainable design principles.”

Page 95 states, “As federal government property leased to foreign missions, chanceries would not generate tax revenue for the District.” Since DOS will own and manage the FMC, including maintaining common areas, it would seem then that federal ownership would require adherence to EO 13514. Please discuss DOS ownership and leasing responsibilities with regard to adherence to EO 13514.

Cumulative Impacts

Page 136 lists development projects in the study area. The projects mentioned should be depicted on a map to show their proximity to the Proposed Action.



The redevelopment of the eastern half of the former WRAMC would provide a mix of quality open spaces and retail, residential uses with diverse housing options, commercial office and/or institutional space, medical care, and cultural and community uses. What are the cumulative impacts associated with the proposed DC-LRA plan and the Proposed Action on the surrounding areas? Please discuss.

Coordination and Consultation

Page 141 states, "At the beginning of the study, scoping letters were mailed to 18 agencies with jurisdiction over features within the study area or an interest in the study and its results, in accordance with the procedural provisions of NEPA and DOS's requirements and policies for early coordination." These letters and responses (if any) should be included in an Appendix.

